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November 15, 2023

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**VIA ECF**

Hon. Naomi Reice Buchwald  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl St.  
 New York, NY 10007-1312

Re: *Tech+IP Advisory, LLC v. BlackBerry Limited*, No. 1:23-cv-05996-NRB  
Letter Motion to Seal

Dear Judge Buchwald:

On behalf of Defendant BlackBerry Limited (“BlackBerry”), we write to seek the Court’s permission pursuant to Section 2.H of Your Honor’s Individual Practices to file portions of BlackBerry’s Memorandum of Law in Support of its Motion to Dismiss (“Memorandum of Law”) and the letter pursuant to Your Honor’s Individual Rule 2(E)(1) (the “Letter”) in redacted form and/or under seal.

On August 4, 2023, this Court granted the parties’ request to redact portions of the Complaint and file Exhibits A and B to the Complaint under seal (the “Sealing Order”). (ECF No. 12.) Plaintiff Tech+IP Advisory, LLC (“Tech+IP”) subsequently filed an Amended Complaint on October 24, 2023 (ECF No. 23). The Amended Complaint also contained redactions and the exhibits were filed under seal pursuant to the Sealing Order. BlackBerry cites to redacted portions of the Amended Complaint and its sealed exhibits in the Memorandum of Law and Letter.

The cited information (i) may be subject to a non-disclosure agreement between Tech+IP and BlackBerry dated April 1, 2020; (ii) descriptions of the terms on which third-parties were willing to purchase BlackBerry’s patent assets; and (iii) references to the terms, including price terms, pursuant to which Tech+IP was willing to provide advisory services to BlackBerry. BlackBerry respectfully requests the Court permit these documents to be filed in redacted form as previously allowed in the Sealing Order.

Accordingly, BlackBerry requests the Court’s permission to seal the unredacted version of the Memorandum of Law and Letter with the viewing level “Selected Parties.” Consistent

*Application  
granted.  
Naomi  
Reice*

*Buchwald,  
11/16/23*

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with the ECF Rules, a redacted version of the Memorandum of Law and Letter will be filed on the public docket.

Respectfully,

*/s/ Jamie A. Levitt*

Jamie A. Levitt

cc: All counsel of record (by ECF)